

To: John Keenan[Keenan.John@epa.gov]
From: McClintock, Katie
Sent: Tue 3/1/2016 10:24:17 PM
Subject: FW: MEDIA INQUIRY: Oregonian re Bullseye Glass -- Deadline Today!

Do you have a sentence handy on this requirement or should we stay silent?

From: Bray, Dave
Sent: Tuesday, March 01, 2016 1:29 PM
To: McClintock, Katie <McClintock.Katie@epa.gov>; Holsman, Marianne <Holsman.Marianne@epa.gov>; Narvaez, Madonna <Narvaez.Madonna@epa.gov>; Skadowski, Suzanne <Skadowski.Suzanne@epa.gov>; Smith, Judy <Smith.Judy@epa.gov>; Philip, Jeff <Philip.Jeff@epa.gov>
Cc: Koprowski, Paul <Koprowski.Paul@epa.gov>; Hastings, Janis <Hastings.Janis@epa.gov>
Subject: RE: MEDIA INQUIRY: Oregonian re Bullseye Glass -- Deadline Today!

Hi Katie,

Those are great edits.

I thought about including something regarding inspections and FCE's but don't have the OECA policy handy to see if it distinguishes between major sources and those few categories of minor source that are required to have Title V permits (e.g., hospital and medical waste incinerators).

If OCE wants to confirm EPA's requirements for inspection and FCE frequency for these Title V minor sources, feel free to add one more sentence to the second paragraph.

Dave

From: McClintock, Katie
Sent: Tuesday, March 01, 2016 1:23 PM
To: Bray, Dave <Bray.Dave@epa.gov>; Holsman, Marianne <Holsman.Marianne@epa.gov>; Narvaez, Madonna <Narvaez.Madonna@epa.gov>; Skadowski, Suzanne <Skadowski.Suzanne@epa.gov>; Smith, Judy <Smith.Judy@epa.gov>; Philip, Jeff <Philip.Jeff@epa.gov>

Cc: Koprowski, Paul <Koprowski.Paul@epa.gov>; Hastings, Janis <Hastings.Janis@epa.gov>
Subject: RE: MEDIA INQUIRY: Oregonian re Bullseye Glass -- Deadline Today!

Thanks Dave – as usual that is a great description. I would make two tiny adjustments below just for appearances (letter almost sounds like we have already decided they are subject and that decision isn't formal or complete). Also don't states have to inspect their title vs and do fces more frequently than minors?

From: Bray, Dave
Sent: Tuesday, March 01, 2016 1:17 PM
To: Holsman, Marianne <Holsman.Marianne@epa.gov>; McClintock, Katie <McClintock.Katie@epa.gov>; Narvaez, Madonna <Narvaez.Madonna@epa.gov>; Skadowski, Suzanne <Skadowski.Suzanne@epa.gov>; Smith, Judy <Smith.Judy@epa.gov>; Philip, Jeff <Philip.Jeff@epa.gov>
Cc: Koprowski, Paul <Koprowski.Paul@epa.gov>; Hastings, Janis <Hastings.Janis@epa.gov>
Subject: RE: MEDIA INQUIRY: Oregonian re Bullseye Glass -- Deadline Today!

How about something like this?

Sources are required to have a Title V operating permit if they are a “major source” under any Clean Air Act program or if they are a “minor source” or “area source” in a source category which is specifically required to have a Title V permit. Glass manufacturing facilities subject to the area source NESHAP (40 CFR Part 63, Subpart SSSSSS) are one of the source categories that are required to have Title V permits. Bullseye is not a major source, so **unless** ODEQ or EPA determines that it is subject to Subpart SSSSSS, it is not required to have a Title V permit.

If Bullseye **was identified as subject to** Subpart SSSSSS and **was** required to get a Title V permit, then both the regulation of its emissions and scrutiny by the regulatory agencies would be increased. Importantly, there would be a production based limit on the total amount of the regulated toxic metals for each furnace that produces at an annual rate of more than 50 tons per year and which is charged with compounds of arsenic, cadmium, chromium, manganese, lead, or nickel as raw materials. Subpart SSSSSS would also impose monitoring requirements and requirements for demonstrating continuous compliance with the emission limit. Finally, the Title V permit would impose a requirement to submit annual compliance certifications to ODEQ with a copy to EPA Region 10.

From: Holsman, Marianne
Sent: Tuesday, March 01, 2016 11:46 AM

To: McClintock, Katie <McClintock.Katie@epa.gov>; Narvaez, Madonna <Narvaez.Madonna@epa.gov>; Skadowski, Suzanne <Skadowski.Suzanne@epa.gov>; Smith, Judy <Smith.Judy@epa.gov>; Philip, Jeff <Philip.Jeff@epa.gov>
Cc: Koprowski, Paul <Koprowski.Paul@epa.gov>; Hastings, Janis <Hastings.Janis@epa.gov>; Bray, Dave <Bray.Dave@epa.gov>
Subject: RE: MEDIA INQUIRY: Oregonian re Bullseye Glass -- Deadline Today!

Thanks very much, Katie.

Dave, could you craft a couple of plain language paragraphs that we can circulate?

Marianne

Follow us!



From: McClintock, Katie
Sent: Tuesday, March 01, 2016 11:42 AM
To: Narvaez, Madonna <Narvaez.Madonna@epa.gov>; Skadowski, Suzanne <Skadowski.Suzanne@epa.gov>; Holsman, Marianne <Holsman.Marianne@epa.gov>; Smith, Judy <Smith.Judy@epa.gov>; Philip, Jeff <Philip.Jeff@epa.gov>
Cc: Koprowski, Paul <Koprowski.Paul@epa.gov>; Holsman, Marianne <Holsman.Marianne@epa.gov>; Hastings, Janis <Hastings.Janis@epa.gov>; Bray, Dave <Bray.Dave@epa.gov>
Subject: RE: MEDIA INQUIRY: Oregonian re Bullseye Glass -- Deadline Today!

I'm paring down the list a bit.

Yes if they are subject to 6S they will need a title v permit

We think it will be determined they are subject to 6S but that is still very much up in the air and nothing will be official until OR requests guidance and epa issues the final letter.

I think the appropriate response would be to lay out the conditions under which someone is subject to title V, such as 6S applicability and major source for haps or criteria pollutants, and then explain how the title v program works and the additional scrutiny involved. Because Bullseye had a non-title v permit, it already had some level of scrutiny, though perhaps not as much as title v (inspection requirements, etc). Uroboros did not have a permit.

Katie

From: Narvaez, Madonna
Sent: Tuesday, March 01, 2016 11:34 AM
To: Skadowski, Suzanne <Skadowski.Suzanne@epa.gov>; Holsman, Marianne <Holsman.Marianne@epa.gov>; Smith, Judy <Smith.Judy@epa.gov>; Philip, Jeff <Philip.Jeff@epa.gov>
Cc: Koprowski, Paul <Koprowski.Paul@epa.gov>; Downey, Scott <Downey.Scott@epa.gov>; McClintock, Katie <McClintock.Katie@epa.gov>; Franklin, Richard <Franklin.Richard@epa.gov>; Wroble, Julie <Wroble.Julie@epa.gov>; Holsman, Marianne <Holsman.Marianne@epa.gov>; Hastings, Janis <Hastings.Janis@epa.gov>; Bray, Dave <Bray.Dave@epa.gov>; Moon, Wally <Moon.Wally@epa.gov>; Koerber, Mike <Koerber.Mike@epa.gov>; Davis, Alison <Davis.Alison@epa.gov>; Barber, Anthony <Barber.Anthony@epa.gov>; Terry, Sara <Terry.Sara@epa.gov>; Davis, Matthew <Davis.Matthew@epa.gov>; Dossett, Donald <Dossett.Donald@epa.gov>
Subject: RE: MEDIA INQUIRY: Oregonian re Bullseye Glass -- Deadline Today!
Importance: High

I'm replying to all because I don't know who will be answering this. I was asking because I was just getting familiar with the Area Source Glass Rule, 40 CFR Part 63 Subpart SSSSSS. I

Ex. 5 - Deliberative Process

If a facility is subject to Subpart 6S, then they would be required to have a Title V permit. That was why I wanted to talk to the permit writer.

From: Skadowski, Suzanne
Sent: Tuesday, March 01, 2016 11:22 AM
To: Holsman, Marianne <Holsman.Marianne@epa.gov>; Smith, Judy <Smith.Judy@epa.gov>; Philip, Jeff <Philip.Jeff@epa.gov>
Cc: Koprowski, Paul <Koprowski.Paul@epa.gov>; Downey, Scott <Downey.Scott@epa.gov>;

Narvaez, Madonna <Narvaez.Madonna@epa.gov>; McClintock, Katie <McClintock.Katie@epa.gov>; Franklin, Richard <Franklin.Richard@epa.gov>; Wroble, Julie <Wroble.Julie@epa.gov>; Holsman, Marianne <Holsman.Marianne@epa.gov>; Hastings, Janis <Hastings.Janis@epa.gov>; Bray, Dave <Bray.Dave@epa.gov>; Moon, Wally <Moon.Wally@epa.gov>; Koerber, Mike <Koerber.Mike@epa.gov>; Davis, Alison <Davis.Alison@epa.gov>; Barber, Anthony <Barber.Anthony@epa.gov>; Terry, Sara <Terry.Sara@epa.gov>; Davis, Matthew <Davis.Matthew@epa.gov>
Subject: MEDIA INQUIRY: Oregonian re Bullseye Glass -- Deadline Today!
Importance: High

Judy's tied up till later this afternoon. Let me know if you need me to respond.

From: Rob Davis [<mailto:RDavis@oregonian.com>]
Sent: Tuesday, March 01, 2016 11:18 AM
To: Smith, Judy <Smith.Judy@epa.gov>; Skadowski, Suzanne <Skadowski.Suzanne@epa.gov>
Subject: FW: Bullseye Glass
Importance: High

Hi Judy, Suzanne:

I'm writing on deadline today about this. Does EPA believe that Bullseye Glass should've been operating under a Title V permit? The company reports producing far more than 50 tons of glass per year. (Please see attached screenshot of DEQ's ACDP showing the company "melts" 2000+ tons of glass a year.)

One potential hiccup here, raised in subsequent emails in the chain, is that the company says it does not operate a continuous furnace.

If the company was operating under a Title V permit, can you tell me what additional level of scrutiny or regulation would've been given to its air emissions?

I'm making the same inquiry of DEQ as well but would like to hear from EPA given that you all raised the issue in the email correspondence below, which I obtained through a public records request.

Thanks in advance for a swift response. I'm at my desk if it's easier, 503.294.7657.

Cheers,

Rob

ROB DAVIS

Reporter

The Oregonian

503.294.7657

@robwdavis

From: "Narvaez, Madonna" <Narvaez.Madonna@epa.gov>

Date: Thursday, February 4, 2016 at 9:48 AM

To: "monro.david@deq.state.or.us" <monro.david@deq.state.or.us>

Cc: "armitage.sarah@deq.state.or.us" <armitage.sarah@deq.state.or.us>

Subject: Bullseye Glass



Good morning, Dave. Can you tell me who the permit writer/inspector is for Bullseye Glass? I am trying to find out how many tons per year of glass they produce. If it is at least 50, they should have a Title V permit, and I can only find an ACDP for them, thanks!

=====

Madonna Narvaez

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